

## United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

Alejandro Hernandez-Cardenas

A097 743 036

YOB: 1972

Principal

the United Mexican States

United States District Court  
Southern District of Texas  
FILED

SEP 17 2015

## CRIMINAL COMPLAINT

Case Number:

M-15-1602-M

Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 15, 2015 in Hidalgo County, in the Southern District of Texas defendants(s) did,

**(Track Statutory Language of Offense)**  
knowing or in reckless disregard of the fact that Placida Salvador-Santos and Nereida Salvador-Santos, citizens and nationals of Mexico, along with twelve (12) other undocumented aliens, for a total of fourteen (14), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) **FELONY**  
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On August 17, 2015, Border Patrol Agents received information regarding apartments located at 3800 East Curve Road Apt# 16 in Edinburg, Texas. Kingsville Border Patrol Intelligence Agents, debriefed a brush guide and the guide was able to provide information on several stash houses in Edinburg, Texas, as well as vehicles that are involved in the transportation of Undocumented Aliens. The guide stated that the target location has an alley access drive way provides access to the back of another apartment complex.

## SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

Yes  No

*Approved by*  
*Adan De Los Santos III*

Signature of Complainant

Adan De Los Santos III Senior Patrol Agent

Printed Name of Complainant

at McAllen, Texas

City and State

*Dorina Ramos*

Signature of Judicial Officer

Sworn to before me and subscribed in my presence,

September 17, 2015

Date

Dorina Ramos, U. S. Magistrate Judge  
Name and Title of Judicial Officer

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF TEXAS**  
**McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-15-1602-M**

**RE: Alejandro Hernandez-Cardenas 0**

**CONTINUATION:**

On several occasions, Border Patrol Agents Ramirez and Garcia conducted surveillance at the target location and on September 10, 2015, agents observed a White Ford Fusion drive to the back of the apartments located on 3800 East Curve Road. Within two minutes of its arrival the Ford Fusion was seen leaving the apartments. Agents were able to follow the vehicle to a country store located at East Texas Road and Cesar Chavez Road and observed a tall heavy set man with three passengers exited the vehicle. The passengers were seen buying a large amount of food.

On September 14, 2015, BPA Ramirez and Garcia observed a Red Chevrolet pickup arrived at target location and within minutes the vehicle was seen leaving. The agents were able to follow the vehicle the HEB Grocery Store located on East Ebony Lane and Closner Boulevard. At the HEB, a subject later identified as Alejandro HERNANDEZ-Cardenas, was seen buying a large amount of food.

On September 15, 2015, BPA Alvarado and Quintanilla conducted surveillance of the target location and at approximately 12:15, a red Chevrolet pickup matching the description that was last seen at HEB in Edinburg, TX left the target location. Agents followed the vehicle to a Water Mill express where the driver purchased five gallons of water. Later that same day, Border Patrol Agents followed the subject to several Auto Parts Stores in Edinburg, Texas and finally observed the subject drive into La Quinta Auto Parts in Hidalgo, Texas. SBPA Rosales and Alvarado along with Hidalgo County Constable Deputy Anzaldua encounter of two subjects, the driver was identified as Jorge Alberto ARELLANO-Coronado as well as the passenger Alejandro HERNANDEZ-Cardenas. Both subjects admitted being Mexican citizens and admitted being in the United States illegally. Subjects were then placed under arrest and were read their Miranda Warning in the Spanish language. Alejandro HERNANDEZ-Cardenas waived his rights and answer questions without the presence of an attorney. During questioning Hernandez admitted he was harboring undocumented aliens at Apartment #16 and gave consent to search of the apartment located at 3800 East Curve Road in Edinburg, Texas. HERNANDEZ-Cardenas opened apartment 16 with a key he had in his possession and total of 14 UDA's were discovered at the apartment. All subjects were transported to the Weslaco Border Patrol Station for processing.

**UNITED STATES DISTRICT COURT**  
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**McALLEN, TEXAS**

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**CONTINUATION:**

**PRINCIPAL: HERNANDEZ-Cardenas, Alejandro**

Alejandro HERNANDEZ-Cardenas was read the Miranda Warning by Border Patrol Agent Tyler Antone in the Spanish language. Subject signed acknowledging he understood his rights and he was willing to answer questions without the presence of an attorney.

Alejandro HERNANDEZ-Cardenas, a citizen and national of Mexico, stated that a man who is called "Peludo or Lobo" gave him a job a smuggler and admitted to picking up illegal aliens at a gas station located at Raul Longoria Road and 7 Mile line in Edinburg, Texas. After picking up the illegal aliens, he would transport them to an apartment complex located at 3816 E. Curve Road Edinburg, Texas. Hernandez stated he dropped off the illegal aliens at the apartments and told them to get inside room #16. Hernandez stated that he was paid \$100.00 U.S. for the transporting the illegal aliens to the apartments and was given an extra \$50.00 to buy the *smuggled aliens food*. Hernandez further stated that he would purchase and deliver *food* to the apartments for the illegal aliens and also provided bed mattress along with a fan, which he found in an adjacent apartment.

**MATERIAL WITNESS STATEMENTS:**

Placida SALVADOR-Santos and Nereida SALVADOR-SANTOS were read the Miranda Warning, signed acknowledging they understood their rights and were willing to answer questions without the presence of an attorney.

**Material Witness 1: Placida SALVADOR-Santos**

Placida SALVADOR-Santos, a citizen and national of Mexico, stated she was to pay \$5,000 to be smuggled into the United States. Salvador stated to have crossed the river on September 11, 2015 near Reynosa, Tamaulipas with 13 other illegals and once the group crossed they were separated into two groups. She along with 7 others were taken to a house where they spent Friday night and the morning they were moved from that house to the apartments where they were apprehended at today. Salvador stated that a male subject told them they would be staying in a room on the second floor and also instructed them not to exit the apartment because the neighbors would contact immigration. Salvador stated that the male subject began bringing mattresses, a television, A/C units and food into the apartment. She further stated that the male subject would bring frozen chicken, potatoes, and vegetables so that they could cook their own food. Salvador stated that the male subject instructed them to purchase an American phone and the entire group pitched in a total 40 dollars. She stated that the male subject told them that the phone would make communication with the person who was going to take them further north easier. Salvador was able to identified Alejandro Hernandez-Cardenas the person in charge of the apartment and taking care of them through photo lineup.

**UNITED STATES DISTRICT COURT  
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McALLEN, TEXAS**

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**CONTINUATION:**

**Material Witness 2: Nereida SALVADOR-SANTOS**

Nereida SALVADOR-SANTOS, a citizen and national of Mexico, stated she was to pay \$5,000 to be smuggled into the United States. After crossing into the United States illegally, she stated that the group was guided to a van and then taken to a stash house where she stayed for one night. The next day the group was driven to a gas station where a man in a small car took drove them to the apartment where they were arrested. Salvador stated that same man would provide food and was the primary caretaker at the apartments where she was arrested. SALDOVAR identified Alejandro HERNANDEZ-CARDENAS as the man who transported her to the apartments and the caretaker of located at 3800 Curve Edinburg, Texas.

**STASH HOUSE CONDITIONS:**

The apartment was in deplorable conditions. The apartment is suitable for a family of three, there were 14 subjects discovered in the apartment which made the conditions unbearable and unlivable. The apartment consisted of a living room, one bedroom and one bathroom. The house did not have furniture and subjects were not provided with mattresses and had to sleep on a dirty floor. There was electricity, and the outside temperature was about 100 degrees. The illegal aliens did have access to water and had plenty of food.